

Exhibit 1

Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3

4 -----x

5 DONNA WOOD, et al, individually
6 and on behalf of all others
7 similarly situated,

8 Plaintiffs,

9 vs. 20 Civ. 2489(LTS)(GWG)

10 MIKE BLOOMBERG 2020, INC.,

11 Defendant.

12 -----x

13
14 VIDEOTAPE DEPOSITION OF
15 LAKISHA WATSON-MOORE
16 VIA ZOOM VIDEOCONFERENCE
17 November 15, 2022

18 10:06 a.m.

19

20

21

22
23 Case No. 5548211

24 Reported by:

25 Maureen Ratto, RPR, CCR

1 LAKISHA WATSON-MOORE

2 A. My sister was up there and
3 plus, I was considering moving up there
4 too and I wanted to get involved there.

5 Q. Was there ever any discussion
6 that you had with anyone from the
7 Campaign about you potentially working
8 for the Campaign in either Mississippi or
9 Tennessee?

10 A. No. Not that I can remember,
11 no.

12 Q. While you were employed by the
13 Campaign did you have any other jobs?

14 A. No. No.

15 Q. Was there a work schedule that
16 you followed while you were employed by
17 the Campaign?

18 A. Yes. You had to get to the
19 office between nine and ten o'clock and
20 you leave the office, it could have been,
21 like, eight and then afterwards, we'd
22 have to call and be on the phone, the
23 phone calls, the statewide phone call.

24 Q. What time were those statewide
25 phone calls?

1 LAKISHA WATSON-MOORE

2 A. They were late, depending. I
3 don't want to give you incorrect
4 information. They were after --
5 definitely after eight.

6 Q. Do you have any estimate as to
7 what time those phone calls were?

8 A. No, but they were definitely
9 after eight because I'm pretty regimented
10 about my workout schedule and my sleep,
11 so they were definitely after eight.

12 Q. Why -- what does your workout
13 schedule and your sleep schedule, how
14 does that relate to the eight o'clock
15 time that you just mentioned?

16 A. I need a lot of time to work
17 out and sleep and I like to work out at
18 four in the morning. So if you are
19 working late, it impacts your, you know,
20 your early morning workouts.

21 Q. How long would the statewide
22 calls that you mentioned last for?

23 A. A while. Sometimes --
24 definitely over an hour.

25 Q. Were these phone calls -- how

Page 152

1 LAKISHA WATSON-MOORE

2 A. When I did, like, the events,
3 when I did the late events, when Kyle
4 would send me out, I would be out pretty
5 late.

6 Q. And what events are you
7 referring to?

8 A. Like, the meeting with the
9 Waterford Dems or, you know, the event
10 with Sam Donaldson, stuff like that, that
11 I can remember.

12 Q. And how often did you attend
13 these events?

14 A. I can't remember.

15 Q. Were there any weeks in which
16 you worked fewer days?

17 A. Weeks, I can't remember.

18 Q. Did you take any sick days?

19 A. I don't remember taking sick
20 days.

21 Q. Did you ever attend any
22 non-work-related appointments during the
23 workday?

24 A. No. I didn't have -- I didn't
25 have any appointments. I don't remember

1 LAKISHA WATSON-MOORE

2 having any appointments.

3 Q. During the workday would you
4 take any breaks?

5 A. To go to the bathroom.

6 Q. Would you eat lunch?

7 A. At my desk.

8 Q. Would you bring lunch?

9 A. I would order lunch.

10 Q. And would you take a break to
11 eat the lunch that you ordered?

12 A. Yes. While working, yes.

13 Q. Did you work through your
14 lunch every day?

15 A. I don't remember. I don't want
16 to give wrong information.

17 Q. Did you ever go to the gym
18 during the workday?

19 A. No. No.

20 Q. Did you post about your
21 workouts on social media while you were
22 employed by the Campaign?

23 A. I believe so. I'm not sure.

24 Q. How often would you post about
25 your workouts?

1 LAKISHA WATSON-MOORE

2 A. No, I don't remember talking
3 to him about this at all.

4 Q. What does your role as a class
5 representative entail?

6 A. I guess I'm the face of folks
7 that were in the Michigan area.

8 Q. Is there anything else?

9 A. That's what I can recall. I
10 worked in Michigan and I guess I'm here
11 for the folks in Michigan that worked
12 there.

13 Q. Have you ever been arrested?

14 A. No. I apologize. No.

15 Q. What's your understanding of
16 your role as a class representative?

17 A. I guess I represent the folks
18 from Michigan.

19 Q. What does that mean to you?

20 A. Representing the folks from
21 Michigan, you know, being that Michigan
22 person, I guess. That's -- you know, I'm
23 not a lawyer, so I wouldn't know anything
24 in further detail.

25 Q. When you say "being that